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July 7, 2022

Via ECF and Facsimile

The Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, NY 10007
Fax: 212-805-7942

*Re: Emery Celli Brinckerhoff Abady Ward & Maazel LLP v. United States
Department of Justice et al., No. 21 Civ. 9566*

Your Honor:

We represent Plaintiff in the above-captioned Freedom of Information Act action. We write jointly with Defendants to request an adjournment *sine die* of the initial pretrial conference scheduled for July 15, 2022.

To date, Defendants have produced three rounds of responsive documents to Plaintiff, and Plaintiff does not intend to litigate further about its entitlement to more documents. Today, Plaintiff conveyed a demand for attorney's fees and costs pursuant to 5 U.S.C. § 552(a)(4)(E) and is awaiting a response from Defendants.

Accordingly, the parties jointly request that the Court adjourn the July 15, 2022 initial pretrial conference *sine die*. We propose that the parties provide a status update to the Court concerning their negotiations over attorney's fees in thirty (30) days.

Respectfully Submitted,

/s/
Katherine Rosenfeld
Max Selver

c. All Counsel of Record (via ECF)